

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmd.uscourts.gov**

In re:

THE TABLE, LLC,

Case No.: 6:16-bk-07294-RAC

Chapter 11

EIN: 45-3617468

Debtor.

***EX PARTE* MOTION TO CONTINUE
THE HEARING ON DISCLOSURE STATEMENT AND CONFIRMATION OF
PLAN OF REORGANIZATION AND THE PRELIMINARY HEARING ON THE
UNITED STATES TRUSTEE'S EXPEDITED MOTION TO DISMISS OR
CONVERT CASE TO CHAPTER 7, OR IN THE ALTERNATIVE, TO APPOINT
A CHAPTER 11 TRUSTEE OR EXAMINER**

Comes now **THE TABLE, LLC**, the Debtor, by and through its undersigned counsel, and files this Motion to Continue the hearing on the Debtor's Disclosure Statement and Confirmation of Plan of Reorganization, and the UST's Motion to Dismiss, etc., and in support thereof would state as follows:

1. On November 7, 2016 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of title 11, U.S.C. §§ 101 *et seq.*, as amended (the "Bankruptcy Code"). The Debtor is a Florida limited liability company, and, since the Petition Date, has remained in possession of its assets as a debtor-in-possession pursuant to § 1107 of the Bankruptcy Code.

2. On January 23, 2017, Guy G. Gebhardt, Acting United States Trustee for Region 21 ("UST"), filed his expedited motion to dismiss or convert case to chapter 7, or in the alternative, to appoint a chapter 11 trustee or examiner (Doc. No. 31).

3. On February 28, 2017, the Debtor filed its Chapter 11 Plan of Reorganization (Doc. 45) and Disclosure Statement (Doc. No. 47).

4. Pursuant to the Order Granting Agreed *Ex Parte* Motion to Continue the Hearing on Disclosure Statement and Confirmation of Plan of Reorganization and the Preliminary Hearing on the United States Trustee's Expedited Motion to Dismiss or Convert Case to Chapter 7, or in the Alternative, to Appoint a Chapter 11 Trustee or Examiner (Doc. No. 63), this case is set for hearing on Debtor's Disclosure Statement and Confirmation of Plan of Reorganization on June 15, 2017, at 10:00 a.m., along with the continued preliminary hearing on the UST's Motion to Dismiss, etc. (Doc. No. 31).

5. The Debtor seeks to continue the hearings and all associated deadlines for sixty (60) days to allow the undersigned to compel the 2004 Examination of Tyler Brassil, who was scheduled for a 2004 Examination on May 6, 2017, but failed to appear.

6. The undersigned certifies that the United States Trustee does not object to the relief sought herein.

WHEREFORE, Debtor requests this Honorable Court for its Order granting this Motion, to continue the hearings set for the June 15, 2017, for forty-five days, and such other relief that may be just and proper in the circumstances.

/s/ Jeffrey S. Ainsworth
Jeffrey S. Ainsworth, Esquire
Florida Bar No.: 060769
E-mail: jeff@bransonlaw.com
BransonLaw PLLC
1501 E. Concord Street
Orlando, Florida 32803
Telephone: (407) 894-6834
Facsimile: (407) 894-8559
Second e-mail: shelly@bransonlaw.com
Attorney for Debtor

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been sent by either electronic transmission to ECF Users or by U.S. Mail the 08th day of June, 2017, to: Audrey M. Aleskovsky, Office of the United States Trustee, 400 West Washington Street, Ste 1100, Orlando, FL 32801; Jill E. Kelso, Esquire, Office of the United States Trustee, 400 West Washington Street, Ste 1100, Orlando, FL 32801; Debtor; Internal Revenue Service, PO Box 21126, Philadelphia, PA 19114; The Securities and Exchange Commission, Branch of Reorganization, 175 West Jackson Street, Ste. 900, Chicago, IL 60604-2601; and to all creditors and interested parties.

/s/ Jeffrey S. Ainsworth
Jeffrey S. Ainsworth, Esquire
BransonLaw PLLC

Label Matrix for local noticing
113A-6
Case 6:16-bk-07294-RAC
Middle District of Florida
Orlando
Wed Jun 7 16:54:08 EDT 2017

Excel Dellagio, LLC
c/o Benjamin C. Iseman
200 E. New England Avenue, Suite 300
Longwood, FL 32789 United States 32789-4345

The Table, LLC
8060 Via Dellagio Way
Suite 106
Orlando, FL 32819-5427

AmTrust North America, Inc.
Buckley King LPA
1400 Fifth Third Center
600 Superior Avenue East
Cleveland, OH 44114-2652

Barbie A. & Keelan M. Parham
8708 Cypress Reserve Cr.
Orlando FL 32836-5402

Brian Margolis
3773 Farm Bell Place
Lake Mary, FL 32746-4100

Department of Revenue
PO Box 6668
Tallahassee, FL 32314-6668

(p) INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Dominick Tardugno
2759 Windsorgate Lane
Orlando, FL 32828-7960

Excel Dellagio, LLC, as successor in interes
Della Road Development, LLC as a subsidi
Shopcore Properties, LLC
c/o Benjamin C. Iseman, Edquire
200 E. New England Avenue, Suite 300
Winter Park, FL 32789-4345

Florida Department of Revenue
Bankruptcy Unit
Post Office Box 6668
Tallahassee FL 32314-6668

Internal Revenue Service
Post Office Box 7346
Philadelphia PA 19101-7346

Kyle Jensen
9442 Bear Lake Road
Apopka, FL 32703-1918

Loren F. Brassil
123 Casa Mirella Way
Suite 2305
Windermere, FL 34786-7862

Michele & Theresa Tardugno
2759 Windsorgate Lane
Orlando, FL 32828-7960

Orange County Tax Collector
PO Box 545100
Orlando FL 32854-5100

RACHEL QUART
LAW OFFICE OF LOWELL J KUVIN LLC
17 E FLAGLER STREET SUITE 223
MIAMI FL 33131-1042

Rachel Quart
133 Seneca Point Trail
Kissimmee, FL 34746-6611

Shopcorp Properties
7940 Via Dellagio Way #200
Orlando, FL 32819-5400

Tyler Brassil
8719 Bay Harbour Blvd
Orlando, FL 32836-5032

United States Trustee - ORL
Office of the United States Trustee
George C Young Federal Building
400 West Washington Street, Suite 1100
Orlando, FL 32801-2210

Jeffrey Ainsworth
BransonLaw PLLC
1501 E. Concord Street
Orlando, FL 32803-5411

Robert B Branson
BransonLaw PLLC
1501 E. Concord Street
Orlando, FL 32803-5411

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Department of Treasury
Internal Revenue Service
Ogden, UT 84201-0038

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| Bypassed recipients | 2 |
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